

<i>SERFF Tracking Number:</i>	<i>PRTA-126393136</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>West Coast Life Insurance Company</i>	<i>State Tracking Number:</i>	<i>44161</i>
<i>Company Tracking Number:</i>	<i>VICKIE-W32</i>		
<i>TOI:</i>	<i>L08 Life - Other</i>	<i>Sub-TOI:</i>	<i>L08.000 Life - Other</i>
<i>Product Name:</i>	<i>WC-UE32 11-09</i>		
<i>Project Name/Number:</i>	<i>WC-UE32 11-09/WC-UE32 11-09</i>		

## Filing at a Glance

Company: West Coast Life Insurance Company

Product Name: WC-UE32 11-09

TOI: L08 Life - Other

Sub-TOI: L08.000 Life - Other

Filing Type: Form

SERFF Tr Num: PRTA-126393136 State: Arkansas

SERFF Status: Closed-Approved-  
Closed

Co Tr Num: VICKIE-W32

Author: Vickie Jerkins

Date Submitted: 11/23/2009

State Status: Approved-Closed

Reviewer(s): Linda Bird

Disposition Date: 11/24/2009

Disposition Status: Approved-  
Closed

Implementation Date Requested: 01/18/2010

State Filing Description:

Implementation Date:

## General Information

Project Name: WC-UE32 11-09

Project Number: WC-UE32 11-09

Requested Filing Mode: Review & Approval

Explanation for Combination/Other:

Submission Type: New Submission

Overall Rate Impact:

Filing Status Changed: 11/24/2009

Deemer Date:

Submitted By: Vickie Jerkins

Filing Description:

Form Number.....Form Title

WC-UE32 11-09.....Cash Value Accumulation Test Endorsement

Status of Filing in Domicile: Pending

Date Approved in Domicile:

Domicile Status Comments: This filing has been  
submitted to our domiciliary state of Nebraska,  
concurrently.

Market Type: Individual

Group Market Size:

Group Market Type:

Explanation for Other Group Market Type:

State Status Changed: 11/24/2009

Created By: Vickie Jerkins

Corresponding Filing Tracking Number:

West Coast Life Insurance Company is a subsidiary of Protective Life Insurance Company. Protective Life Insurance Company represents West Coast Life Insurance Company in the submission of the above-referenced forms and will negotiate with state insurance departments for their approval. A separate letter of authorization is not required due to subsidiary status.

SERFF Tracking Number:	PRTA-126393136	State:	Arkansas
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Product Name:	WC-UE32 11-09		
Project Name/Number:	WC-UE32 11-09/WC-UE32 11-09		

The intended implementation date for this filing is January 18, 2010 or upon approval by your Department. The above referenced Individual Life Filing is being submitted for filing acknowledgement or prior approval, as appropriate. This filing does not contain any unusual or possibly controversial items that vary from normal company or industry standards. The form submitted in this filing is new and will not replace any forms currently in use. This filing has been submitted to our domiciliary state of Nebraska, concurrently.

With the exception of company specific information (Name, Logo, Addresses, Form numbering, etc) this filing is identical to SERFF submission for Protective Life Insurance Company.

The submitted endorsement adds the Cash Value Accumulation Test option to the policy. It will only print for new issue only, and only if the Cash Value Accumulation Test is selected. Currently this endorsement will be offered on Universal Life policy WC-U12-AR 9-08, which was approved on 08/25/2008, SERFF Tracking # PRTA-125781977; State Tracking # 40018. However we are requesting approval of this endorsement for use with any form we deem appropriate for the future.

The required Actuarial Materials and a Statement of Variability has been provided.

Endorsement WC-UE32 has obtained a FLESCH Ease of Reading Test Score of 51.59. The form has been created using fonts of 10 point and greater. The company reserves the right at any time to make minor non-material format changes including, but not limited to: paper stock, type face (but not font size) and page layout that become unavoidably necessary as a result of computer hardware and/or software upgrades and print technology changes. We certify that any necessary format changes will not affect the specific content of the approved form.

Required filing fees have been submitted via EFT.

If you are in need of further information to complete the review of this filing, I can be contacted via SERFF Notes, email at Vickie.Jerkins@protective.com or tollfree at 1-800-866-3555 ext. 5514.

## Company and Contact

### Filing Contact Information

Vickie Jerkins, Policy Contract Filing Specialist	vickie.jerkins@protective.com
2801 Highway 280 South	800-866-3555 [Phone] 5514 [Ext]
Birmingham, AL 35223	205-268-3401 [FAX]

### Filing Company Information

West Coast Life Insurance Company	CoCode: 70335	State of Domicile: Nebraska
2801 Highway 280	Group Code: 458	Company Type: Life Insurance

SERFF Tracking Number: PRTA-126393136 State: Arkansas  
 Filing Company: West Coast Life Insurance Company State Tracking Number: 44161  
 Company Tracking Number: VICKIE-W32  
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 Product Name: WC-UE32 11-09  
 Project Name/Number: WC-UE32 11-09/WC-UE32 11-09

Birmingham, AL 35223 Group Name: State ID Number:  
 (800) 866-3555 ext. [Phone] FEIN Number: 94-0971150

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## Filing Fees

Fee Required? Yes  
 Fee Amount: \$50.00  
 Retaliatory? No  
 Fee Explanation: \$50.00 per form  
 Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
West Coast Life Insurance Company	\$50.00	11/23/2009	32249671

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## Correspondence Summary

### Dispositions

<b>Status</b>	<b>Created By</b>	<b>Created On</b>	<b>Date Submitted</b>
Approved-Closed	Linda Bird	11/24/2009	11/24/2009

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## Disposition

Disposition Date: 11/24/2009

Implementation Date:

Status: Approved-Closed

Comment:

Rate data does NOT apply to filing.

SERFF Tracking Number:	PRTA-126393136	State:	Arkansas
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Product Name:	WC-UE32 11-09		
Project Name/Number:	WC-UE32 11-09/WC-UE32 11-09		

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Flesch Certification		Yes
Supporting Document	Application		No
Supporting Document	Supporting Documentation		Yes
Form	Cash Value Accumulation Test		Yes
	Endorsement		

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## Form Schedule

Lead Form Number: WC-UE32 11-09

Schedule Item Status	Form Number	Form Type Form Name	Action	Action Specific Data	Readability	Attachment
	WC-UE32 11-09	Policy/Cont Cash Value ract/Fratern Accumulation Test al Endorsement Certificate: Amendmen t, Insert Page, Endorseme nt or Rider	Initial		51.590	WC-UE32 11-09.pdf



**West Coast Life Insurance Company**  
[PO Box 830570]  
[Birmingham AL 35283]

[1-800-366-9378]  
**State of Domicile: [Nebraska]**

## **CASH VALUE ACCUMULATION TEST ENDORSEMENT**

The Company issues this endorsement as a part of the Policy to which it is attached. The endorsement modifies the Policy to comply with the Cash Value Accumulation Test. All Policy provisions not expressly modified by this endorsement remain in full force and effect.

The Policy is modified as follows:

The "THE DEATH BENEFIT" section of the Policy is deleted in its entirety, and replaced with the new "THE DEATH BENEFIT" provision, below.

### **THE DEATH BENEFIT**

The actual death benefit proceeds are determined as of the date of death of the Last Survivor of the Joint Insureds and are subject to the policy provisions which may have an effect on the proceeds. The death benefit provided by this Policy will be the greater of:

- (a) the face amount; or
- (b) the Minimum Death Benefit, described below.

The Minimum Death Benefit is the amount of Level Death Benefit that the Policy Value would currently buy if paid as the Net Single Premium, when Net Single Premium is determined according to the Cash Value Accumulation Test as prescribed at that time in section 7702 of the Internal Revenue Code of 1986, as amended. Pursuant to that section as of the Policy Effective Date, for the purpose of determining Net Single Premium:

- a) the mortality charges used shall be the maximum cost of insurance charges guaranteed under the Policy, provided they do not exceed the maximum charges permitted under Code section 7702; and,
- b) the interest rate used shall be the greater of the guaranteed interest rate shown in the Policy Schedule or an annual effective interest rate of 4%; and,
- c) the Policy shall be deemed to mature no earlier than the date the younger Joint Insured attains age [95] and no later than the date the younger Joint Insured attains age [100].

The "Premium Limitation" provision located in the "PREMIUM PAYMENTS" section of the policy is deleted in its entirety and replaced with the new "Premium Limitation" provision below.

**Premium Limitation.** The Company reserves the right to refund premiums paid, whether scheduled or not, during each policy year which in the policy year:

- (a) increased the difference between the death benefit and the policy value, and
- (b) Exceeds \$20 per \$1000 of face amount.

Any refund will be made no later than 60 days after the policy anniversary following the premium payment(s).

The "Cost of Insurance" provision located in the "NON-FORFEITURE PROVISIONS" section of the policy is deleted in its entirety and replaced with the new "Cost of Insurance" provision, below.



**Cost of Insurance.** The cost of insurance is determined at the end of each policy month as follows:

- (1) divide the death benefit at the beginning of the policy month by the sum of one plus the monthly guaranteed interest rate;
- (2) reduce the result by the amount of policy value (prior to deducting the cost of insurance) at the beginning of the policy month if the death benefit is the face amount, or policy value (discounted at one plus the monthly guaranteed interest rate and prior to deducting the cost of insurance) at the beginning of the policy month, if the death benefit is the Minimum Death Benefit;
- (3) multiply the difference (divided by \$1000) by the cost of insurance rate as described in the Cost of Insurance Rates provision.

Signed for the Company as of the Effective Date of Coverage.

**WEST COAST LIFE INSURANCE COMPANY**

[ *Deborah J. Long* ]

**Deborah J. Long  
Secretary**

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## Supporting Document Schedules

	<b>Item Status:</b>	<b>Status</b>
		<b>Date:</b>

**Satisfied - Item:** Flesch Certification

**Comments:**

**Attachments:**

Readability Certification.pdf

AR Certification.pdf

	<b>Item Status:</b>	<b>Status</b>
		<b>Date:</b>

**Bypassed - Item:** Application

**Bypass Reason:** Not applicable.

**Comments:**

	<b>Item Status:</b>	<b>Status</b>
		<b>Date:</b>

**Satisfied - Item:** Supporting Documentation

**Comments:**

Actuarial Description

Statement of Variability

**Attachments:**

WC-UE32 Actuarial Description.pdf

Statement of Variables.pdf

West Coast Life Insurance Company  
PO BOX 10648  
Birmingham, AL 35202-0648



NAIC 458-70335  
FEIN 94-0971150

## READABILITY CERTIFICATION

**Regarding:** Form Number Form Title  
WC-UE32 11-09 Cash Value Accumulation Test Endorsement

This is to certify that the enclosed form (and the corresponding state specific variations) has achieved compliance with the FLESCH Ease of Reading Test, with scores as outlined in the following table.

<b>Form:</b>	WC-UE32
<b>Words:</b>	534
<b>Sentences:</b>	21
<b>Syllables:</b>	817
<b>FLESCH Score:</b>	<u>51.59</u>

Keith Kirkley, J.D., MBA  
Assistant Vice President  
Product Implementation  
Contract Drafting & Filing Team

November 18, 2009

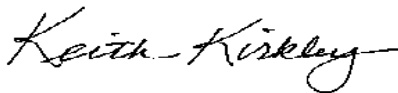
# **WEST COAST LIFE INSURANCE COMPANY BIRMINGHAM, ALABAMA**

## **CERTIFICATION OF COMPLIANCE**

### **Arkansas**

**FORM(S):** WC-UE32 11-09  
Cash Value Accumulation Test Endorsement

This is to certify that the enclosed form(s) are in compliance with Rule and Regulation 19 of the State of Arkansas regarding the Unfair Sex Discrimination in the Sale of Insurance.



Keith Kirkley, J.D., MBA  
Assistant Vice President  
Product Implementation  
Contract Drafting & Filing Team

November 18, 2009

**WEST COAST LIFE INSURANCE COMPANY**

**Actuarial Description**

**Death Benefit Option Endorsement with Cash Value Accumulation Test**

**Form WC-UE32 11-09**

**I. DESCRIPTION OF ENDORSEMENT CHARACTERISTICS**

The endorsement modifies the policy to add the IRC Sec. 7702 Cash Value Accumulation test.

The endorsement form defines all of the terms and conditions.

**II. BASIS OF VALUES**

This endorsement does not have any actual value accessible to the policyholder.

**III. STATUTORY RESERVES**

No reserves will be held explicitly for this endorsement. If the endorsement is attached to the policy, the reserves on the policy will reflect the appropriate death benefit.

A handwritten signature in black ink, reading "David C. Martin". The signature is written in a cursive, flowing style.

David C. Martin, FSA, MAAA  
Vice President and UL Pricing Lead  
November 20, 2009

West Coast Life Insurance Company  
Birmingham, Alabama 35282-9887

NAIC 458-70335  
FEIN 94-0971150

**Statement of Variability**  
**Form: UL-E32 11-09 (and state variations)**

**Specific Variables**

Company Address and Phone Number – Will only be changed to accurately disclose the company's correct mailing address and phone number.

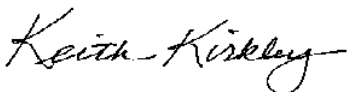
Company State of Domicile – Will only be changed to accurately disclose the company's state of domicile. This change would not be made until any required notifications or regulatory filings are completed.

Officer Signatures – Will only be changed to accurately disclose the company's officers. This change would not be made until any required notifications or regulatory filings are completed.

**CERTIFICATION**

I certify that the information contained in this Statement of Variability is true and correct to the best of my knowledge and belief, and that I am duly authorized by the company to make this certification.

Signed for the Company by:



Keith Kirkley, JD, MBA  
AVP – Product Development  
West Coast Life Insurance Company  
November 18, 2009